

The Bread Kitchen C.I.C.



Data Protection & GDPR Policy

In accordance with the UK GDPR and Data Protection Act 2018

1. Introduction

The Bread Kitchen C.I.C. is committed to protecting the privacy and personal data of all individuals we work with, including children, young people, parents/carers, staff, volunteers, and partners.

We process personal data in accordance with:

- UK General Data Protection Regulation
- Data Protection Act 2018

We aim to ensure that all personal data is handled lawfully, fairly, transparently, and securely.

2. Data Protection Principles

We adhere to the core principles of data protection. Personal data will be:

- Processed lawfully, fairly and transparently
 - Collected for specified, explicit and legitimate purposes
 - Adequate, relevant and limited to what is necessary
 - Accurate and kept up to date
 - Retained only as long as necessary
 - Processed securely to prevent unauthorised access, loss or damage
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3. Data Controller

The Bread Kitchen C.I.C. is the **Data Controller**.

Data Protection Lead:

Catherine Cordiner-Achenbach

Responsibilities include:

- Ensuring compliance with data protection law
 - Managing data protection procedures
 - Responding to Subject Access Requests
 - Liaising with the Information Commissioner's Office (ICO) where required
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4. Lawful Bases for Processing

We process personal data under the following lawful bases:

- **Contract** – to provide services to children, learners and families
- **Legal obligation** – to comply with HMRC, safeguarding, and other statutory duties
- **Vital interests** – to protect someone's life or safety
- **Legitimate interests** – for the effective running of the organisation
- **Consent** – where required (e.g. photos, marketing, some third-party sharing)

For **special category data** (e.g. health information), we rely on:

- Provision of care and safeguarding
 - Employment law obligations
 - Explicit consent where appropriate
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5. Confidentiality

We respect confidentiality in the following ways:

- Information about a child is only shared with their parent/carer unless safeguarding concerns apply
 - Information is not shared with third parties without consent unless legally required
 - Safeguarding concerns are recorded and shared only with designated safeguarding leads and relevant authorities
 - Staff discuss personal data only where necessary for service delivery
 - Staff receive confidentiality training as part of induction
 - Personnel matters are kept strictly confidential
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6. Information We Hold

Children and Families

We collect only necessary information, including:

- Registration and contact details
- Medical and dietary information
- Attendance records
- Accident and incident records
- Safeguarding information where applicable

Lawful basis: Contract and legal obligation

Special category data condition: Provision of care and safeguarding

Staff and Volunteers

We hold data including:

- Contact details
- Employment records
- Payroll and HMRC information
- Health information (where relevant)

Lawful basis: Legal obligation and contract

Special category data condition: Employment law obligations

7. Storage and Security

We implement appropriate technical and organisational measures to protect personal data:

- Paper records stored in locked cabinets
 - Electronic data stored on password-protected systems
 - Access restricted to authorised personnel only
 - Secure disposal (shredding/deletion) of data when no longer required
 - Use of secure systems for payroll, bookings and communication
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8. Data Retention

We retain personal data only as long as necessary, in line with:

- Legal requirements
- Insurance requirements
- Safeguarding guidance
- Best practice retention schedules

When no longer required:

- Electronic data is securely deleted
 - Paper records are securely destroyed
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9. Sharing Information

We only share personal data where necessary and lawful:

- With consent from parents/carers where appropriate
- Without consent where required for:
 - Safeguarding
 - Prevention/detection of crime
 - Legal obligations

We may share data with:

- Local authorities
- Safeguarding agencies
- HMRC
- Ofsted/commissioners
- Approved third-party service providers (e.g. payroll, booking systems)

All third parties are required to comply with UK GDPR.

Where information is shared without consent, this is recorded with reasons.

10. Safeguarding and Information Sharing

Where there are safeguarding concerns, information will be shared in line with:

- Government guidance on safeguarding
- The organisation's Safeguarding Policy

Our primary responsibility is the safety and wellbeing of children and vulnerable individuals.

11. Data Subject Rights

Individuals have the following rights under the UK General Data Protection Regulation:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure (where applicable)

- Right to restrict processing
 - Right to data portability
 - Right to object
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12. Subject Access Requests (SARs)

- Requests must be responded to within **one month**
- Requests can be made by:
 - Parents/carers (for their child)
 - Staff or volunteers (for their own data)

We will:

- Provide copies of requested data
 - Correct inaccurate data
 - Explain any lawful reasons for refusing deletion
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13. Data Breaches

Any data breach will be:

- Reported immediately to the Data Protection Lead
 - Assessed and recorded
 - Reported to the Information Commissioner's Office within 72 hours if required
 - Communicated to affected individuals where there is a high risk
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14. Complaints

If an individual is unhappy with how their data has been handled, they may:

- Raise concerns with The Bread Kitchen C.I.C.
 - Complain to the Information Commissioner's Office
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15. Training and Awareness

- All staff and volunteers receive data protection training
- Data protection is included in induction
- Regular updates are provided as required

16. Monitoring and Review

This policy will be:

- Reviewed annually
- Updated in line with changes in legislation or organisational practice

Next review date: 30 June 2027

17. Contact Information

Data Protection Lead:

Catherine Cordiner-Achenbach

Email: office@thebreadkitchen.org.uk

18. Signatures

Signed: _____ *C. Cordiner-Achenbach* _____

Name: Catherine Cordiner-Achenbach

Date: _____ 01/04/26 _____